

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PAPST LICENSING GmbH & Co. KG)	
)	Civil Action No. 08 CV 3608
Plaintiff,)	
)	
v.)	JURY TRIAL DEMANDED
)	
SANYO ELECTRIC CO., LTD., SANYO)	Honorable Suzanne B. Conlon
NORTH AMERICA CORPORATION)	
)	Mag. Judge Nan Nolan
Defendants.)	

**PAPST LICENSING’S CONSENT MOTION FOR AN EXTENSION OF TIME
FOR SANYO NORTH AMERICA CORPORATION TO RESPOND TO COMPLAINT**

Plaintiff Papst Licensing GmbH & Co. KG (“Papst Licensing”), by and through counsel, and pursuant to Federal Rules of Civil Procedure 6(a) and 12(a), moves this Court for an extension of time for Defendant Sanyo North America Corporation (“SNA”) to respond to Plaintiff’s Complaint. In support of its Motion, Papst Licensing states as follows:

1. On June 24, 2008, Plaintiff filed its Complaint alleging infringement of United States Patent Numbers 6,470,399 B1 and 6,895,449 B2.
2. On June 27, 2008, SNA was served with Plaintiff’s Complaint.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), SNA’s response to Plaintiff’s Complaint is due on July 17, 2008.
4. Timothy J. Vezeau of Katten Muchin Rosenman LLP, one of the counsel for SNA, contacted counsel for Plaintiff regarding a limited extension of time to respond to the Amended Complaint, and Papst Licensing agreed to an extension up through and including August 1, 2008.

5. Papst Licensing acknowledges that SNA's agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, SNA's right to file counterclaims, affirmative defenses, motions, or to otherwise respond to the Complaint and its allegations.

6. Further, Defendant Sanyo Electric Co., Ltd. ("Sanyo Electric"), a Japanese corporation, has not yet been served, however Papst Licensing is in the process of effectuating service through the provisions of the Hague Convention. Accordingly, no extension for Sanyo Electric is required or requested at this time.

WHEREFORE, Papst Licensing respectfully requests, as an accommodation to SNA, that the Court enter an order extending the time for SNA to answer Plaintiff's Complaint to August 1, 2008.

DATED: July 14, 2008

/s/ Joseph E. Cwik
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KG

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PAPST LICENSING'S CONSENT MOTION FOR AN EXTENSION OF TIME FOR SANYO NORTH AMERICA CORPORATION TO RESPOND TO COMPLAINT** was electronically filed on July 14, 2008 with the Clerk of Court using CM/ECF system and served upon all parties of record. Additionally, a courtesy copy of the foregoing was served by U.S. mail and electronic mail upon:

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/s/ Joseph E. Cwik